

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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MARK I. SOKOLOW, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 04cv397 (GBD) (RLE)
)	
THE PALESTINE LIBERATION)	
ORGANIZATION, <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

**DECLARATION OF LAURA G. FERGUSON IN SUPPORT
OF DEFENDANTS' MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT
OF THEIR MOTION FOR SUMMARY JUDGMENT & DEFENDANTS' STATEMENT
OF MATERIAL FACTS AS TO WHICH THERE IS NO GENUINE ISSUE**

LAURA G. FERGUSON declares as follows:

1. I am a member of the Bar of the District of Columbia and a member of Miller and Chevalier Chartered, counsel for the *Palestinian Liberation Organization* and *Palestinian Authority* Defendants. I am admitted in the above-captioned matter *pro hac vice*. I submit this declaration in support of Defendants' Memorandum of Law in Support of Their Motion for Summary Judgment, and Defendants' Statement of Material Facts as to Which There is No Genuine Issue.

2. Attached to the Memorandum of Law in Support of Defendants' Motion for Summary Judgment are true and correct copies of the following materials:

Exhibit	Description
A.	Defendants' Statement of Material Facts as to Which There Is No Genuine Issue
B.	Lawfare: Fighting Back, Some of Our Cases (Available at: www.israelawcenter.org)

C.	Plaintiffs' Exhibit List
D.	Plaintiffs' Trial Exhibit ("PTE") 196
E.	PTE 376
F.	Excerpts from PTE 380
G.	Excerpts from Matthew Levitt Expert Report (Sokolow)
H.	Excerpts from PTE 629
I.	PTE 624
J.	Excerpts from Alon Eviatar Expert Report (Corrected)(Sokolow) (FILED UNDER SEAL)
K.	PTE 217
L.	Excerpts from Israel Shrenzel Expert Report (Sokolow) (FILED UNDER SEAL)
M.	PTE 186
N.	Excerpts from PTE 948
O.	PTE 353
P.	PTE 467
Q.	PTE 465
R.	PTE 321
S.	PTE233
T.	PTE 339
U.	Expert Report of Sharon Weill (Sokolow)
V.	Expert report of Michael Sfard (Sokolow)
W.	Excerpts from Deposition Transcript of Nick Kaufman, <i>Sokolow v. PLO</i> , No. 04-cv-397 (S.D.N.Y.)
X.	Excerpts from the Deposition of Michael Sfard, <i>Sokolow v. PLO</i> , No. 04-cv-397 (S.D.N.Y.)
Y.	Excerpts from Nick Kaufman Expert Report (Sokolow)

3. Attached to the Statement of Material Facts are true and correct copies of the following materials:

Exhibit	Description
1.	Excerpt of the June 16, 2010 Deposition Transcript of Hasan Abu-Libdeh, <i>Estate of Klieman v. Palestinian Auth.</i> , No. 04-cv-1173 (D.D.C.)
2.	Excerpt of the February 10, 2011 Deposition Transcript of Afif Safieh, <i>Estate of Klieman v. Palestinian Auth.</i> , No. 04-cv-1173 (D.D.C.)
3.	Excerpt of the March 9, 2010 Deposition Transcript of Salam Fayyad, <i>Saperstein v. Palestinian Auth.</i> , No. 04-cv-20225 (S.D. Fla.)
4.	Excerpt of the October 10, 2013 Deposition Transcript of John Quigley, <i>Sokolow v. PLO</i> , No. 04-cv-397 (S.D.N.Y.)
5.	Defendants' Trial Exhibit ("DTE") 58: November 26, 2012 United Nations General Assembly Report on the Status of Palestine in the United Nations (02:008629 – 02:008632)

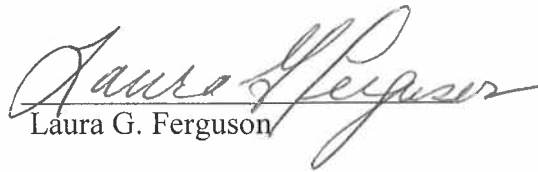
6.	Excerpt of the Guetta Objections & Responses to Defendants' 1 st Requests for Admission (dated January 7, 2013)
7.	Excerpt of the Gould & Waldman Objections & Answers to Defendants' 1 st Requests for Admission (dated January 7, 2013)
8.	Excerpt of the Sokolow Objections & Responses to Defendants' 1 st Requests for Admission (dated January 7, 2013)
9.	Excerpt of the Bauer Objections & Responses to Defendants' 1 st Requests for Admission (dated January 7, 2013)
10.	Excerpt of the Mandelkorn Objections & Responses to Defendants' 1 st Requests for Admission (dated January 7, 2013)
11.	Excerpt of the Carter, Coulter & Gritz Objections & Responses to Defendants' 1 st Requests for Admission (dated January 7, 2013)
12.	Excerpt of the Goldberg Objections & Responses to Defendants' 1 st Requests for Admission (dated January 7, 2013)
13.	Excerpt of the October 13, 2013 Deposition Transcript of Raja Shehadeh, <i>Sokolow v. PLO</i> , No. 04-cv-397 (S.D.N.Y.)
14.	Excerpt of the August 8, 2010 Deposition Transcript of Majed Faraj, <i>Estate of Klieman v. Palestinian Auth.</i> , No. 04-cv-1173 (D.D.C.)
15.	Excerpt of the May 25, 2010 Deposition Transcript of Yaser Muhammed Mussa Shaqba'u, <i>Saperstein v. Palestinian Auth.</i> , No. 04-cv-20225 (S.D. Fla.)
16.	Excerpt of the June 15, 2010 Deposition Transcript of Mazen Jadallah, <i>Estate of Klieman v. Palestinian Auth.</i> , No. 04-cv-1173 (D.D.C.)
17.	Excerpt of the June 27, 2012 Deposition Transcript of Varda Guetta, <i>Sokolow v. PLO</i> , No. 04-cv-397 (S.D.N.Y.)
18.	Excerpt of the August 3, 2012 Deposition Transcript of Oz Guetta, <i>Sokolow v. PLO</i> , No. 04-cv-397 (S.D.N.Y.)
19.	Excerpt of the March 18, 2007 Deposition Transcript of Varda Guetta, <i>Linde v. Arab Bank, PLC</i> , No. (04-cv-2799) (consolidated) (E.D.N.Y.)
20.	Gary L. Wells Expert Reports (July 15, 2013) (Sokolow)
21.	DTE 33: December 16, 2001 President Arafat Address to the Palestinian People (02:007743 – 02:007746)
22.	Excerpt of the July 31, 2012 Deposition Transcript of Shmuel Waldman, <i>Sokolow v. PLO</i> , No. 04-cv-397 (S.D.N.Y.)
23.	Excerpt of the March 8, 2007 Deposition Transcript of Shayna Gould, <i>Linde v. Arab Bank, PLC</i> , No. (04-cv-2799) (consolidated) (E.D.N.Y.)
24.	Excerpt of the July 31, 2012 Deposition Transcript of Henna Waldman, <i>Sokolow v. PLO</i> , No. 04-cv-397 (S.D.N.Y.)
25.	Excerpt of the June 28, 2012 Deposition Transcript of Elise Gould, <i>Sokolow v. PLO</i> , No. 04-cv-397 (S.D.N.Y.)
26.	Excerpt of the July 11, 2012 Deposition Transcript of Shayna (Gould) Elliott, <i>Sokolow v. PLO</i> , No. 04-cv-397 (S.D.N.Y.)
27.	Excerpt of the September 4, 2012 Deposition Transcript of Mark Sokolow, <i>Sokolow v. PLO</i> , No. 04-cv-397 (S.D.N.Y.)
28.	DTE 35: February 3, 2002 OP-ED by Yasir Arafat regarding The Palestinian Vision of Peace (02:008479 – 02:008483)

29.	Excerpt of the October 3, 2012 Deposition Transcript of Elana Sokolow, <i>Sokolow v. PLO</i> , No. 04-cv-397 (S.D.N.Y.)
30.	Excerpt of the September 5, 2012 Deposition Transcript of Jamie Sokolow, <i>Sokolow v. PLO</i> , No. 04-cv-397 (S.D.N.Y.)
31.	Excerpt of the September 5, 2012 Deposition Transcript of Lauren Sokolow, <i>Sokolow v. PLO</i> , No. 04-cv-397 (S.D.N.Y.)
32.	Excerpt of the September 4, 2012 Deposition Transcript of Rena Sokolow, <i>Sokolow v. PLO</i> , No. 04-cv-397 (S.D.N.Y.)
33.	Excerpt of the August 2, 2012 Deposition Transcript of Revital Bauer, <i>Sokolow v. PLO</i> , No. 04-cv-397 (S.D.N.Y.)
34.	Excerpt of the September 4, 2009 Deposition Transcript of Alan Bauer, <i>Linde v. Arab Bank, PLC</i> , No. (04-cv-2799) (consolidated) (E.D.N.Y.)
35.	Excerpt of the August 1, 2012 Deposition Transcript of Alan Bauer, <i>Sokolow v. PLO</i> , No. 04-cv-397 (S.D.N.Y.)
36.	DTE 37: April 13, 2002 Statement on behalf of the President and the Palestinian Leadership (02:006779 – 02:006780)
37.	Excerpt of the August 2, 2012 Deposition Transcript of Yehonathan Bauer, <i>Sokolow v. PLO</i> , No. 04-cv-397 (S.D.N.Y.)
38.	Excerpt of the December 13, 2012 Deposition Transcript of Shaul Mandelkorn, <i>Sokolow v. PLO</i> , No. 04-cv-397 (S.D.N.Y.)
39.	Excerpt of the December 12, 2012 Deposition Transcript of Nurit Mandelkorn, <i>Sokolow v. PLO</i> , No. 04-cv-397 (S.D.N.Y.)
40.	Excerpt of the December 12, 2012 Deposition Transcript of Leonard Mandelkorn, <i>Sokolow v. PLO</i> , No. 04-cv-397 (S.D.N.Y.)
41.	DTE 39: May 8, 2002 Statement from President Arafat Condemning Terrorist Attacks Against Palestinian and Israeli Civilians (02:006781)
42.	DTE 40: June 19, 2002 Statement by the Palestinian Leadership denouncing suicide attacks in Jerusalem (02:006410)
43.	DTE 42: June 19, 2002 Statement by President Yasser Arafat Condemning the Attacks Against Israeli Civilians (02:006785)
44.	DTE 43: July 31, 2002 Statement by the Palestinian Leadership condemning the terrorist attack on the Hebrew University in Jerusalem (02:006413)
45.	Excerpt of the July 9, 2012 Deposition Transcript of Shaun Choffel, <i>Sokolow v. PLO</i> , No. 04-cv-397 (S.D.N.Y.)
46.	Excerpt of the July 10, 2012 Deposition Transcript of Larry Carter, <i>Sokolow v. PLO</i> , No. 04-cv-397 (S.D.N.Y.)
47.	Excerpt of the July 12, 2012 Deposition Transcript of Katherine Baker, <i>Sokolow v. PLO</i> , No. 04-cv-397 (S.D.N.Y.)
48.	Excerpt of the July 12, 2012 Deposition Transcript of Richard Blutstein, <i>Sokolow v. PLO</i> , No. 04-cv-397 (S.D.N.Y.)
49.	Excerpt of the July 13, 2012 Deposition Transcript of Rebekah Blutstein, <i>Sokolow v. PLO</i> , No. 04-cv-397 (S.D.N.Y.)
50.	Excerpt of the October 17, 2012 Deposition Transcript of Nevenka Gritz, <i>Sokolow v. PLO</i> , No. 04-cv-397 (S.D.N.Y.)
51.	DTE 44: March 5, 2003 Statement issued by the Palestinian Leadership (02:006782)

52.	DTE 45: May 18, 2003 Official Statement by an official Spokesperson – The Leadership deplors violence and counter-violence against Israeli and Palestinian civilians (02:006786)
53.	DTE 46: June 11, 2002 Statement of President Yasser Arafat (02:006783 – 02:006784)
54.	DTE 47: September 10, 2003 Official Statement by the Chairman of the Palestinian Legislative Council and Acting Prime Minister (02:006787)
55.	DTE 48: January 29, 2004 Statement on behalf of PA Prime Minister denouncing Jerusalem bus bombing (02:006414)
56.	Excerpt of the October 14, 2012 Deposition Transcript of Shifra Goldberg, <i>Sokolow v. PLO</i> , No. 04-cv-397 (S.D.N.Y.)
57.	Excerpt of the October 14, 2012 Deposition Transcript of Chana Goldberg, <i>Sokolow v. PLO</i> , No. 04-cv-397 (S.D.N.Y.)
58.	Excerpt of the October 15, 2012 Deposition Transcript of Ester Goldberg, <i>Sokolow v. PLO</i> , No. 04-cv-397 (S.D.N.Y.)
59.	Excerpt of the October 15, 2012 Deposition Transcript of Yitzhak Goldberg, <i>Sokolow v. PLO</i> , No. 04-cv-397 (S.D.N.Y.)
60.	Excerpt of the October 15, 2012 Deposition Transcript of Shoshana Goldberg, <i>Sokolow v. PLO</i> , No. 04-cv-397 (S.D.N.Y.)
61.	Excerpt of the October 15, 2012 Deposition Transcript of Eliezer Goldberg, <i>Sokolow v. PLO</i> , No. 04-cv-397 (S.D.N.Y.)
62.	Plaintiffs' Trial Exhibit(s) ("PTE") 88 (02:009412) & excerpts of 94 (02:009450, 02:009452): Ali Ja'ara employment records (FILED UNDER SEAL)
63.	Excerpt of the July 11, 2012 Deposition Transcript of Ronald Gould, <i>Sokolow v. PLO</i> , No. 04-cv-397 (S.D.N.Y.)
64.	Excerpt of the July 10, 2012 Deposition Transcript of Jessica Rine, <i>Sokolow v. PLO</i> , No. 04-cv-397 (S.D.N.Y.)
65.	Excerpt of the December 13, 2012 Deposition Transcript of Robert Coulter, Sr., <i>Sokolow v. PLO</i> , No. 04-cv-397 (S.D.N.Y.)
66.	Excerpt of the September 23, 2012 Deposition Transcript of Dianne Coulter Miller, <i>Sokolow v. PLO</i> , No. 04-cv-397 (S.D.N.Y.)
67.	Excerpt of the September 23, 2012 Deposition Transcript of Robert Coulter, Jr., <i>Sokolow v. PLO</i> , No. 04-cv-397 (S.D.N.Y.)
68.	Defendants' Objections and Answers to Plaintiffs' Personal Jurisdiction Interrogatories (dated January 29, 2009)
69.	PTE 334: Photograph Line-up reviewed by Varda Guetta (P 3:000082 – P 3:000096)
70.	DTE 34: 2/1/2002 Administrative Order dismissing Mohamed Hashaykah from payroll (02:006034)
71.	Declaration of Ambassador Maen Areikat (dated May 2, 2014)

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 2, 2014
Washington, D.C.


Laura G. Ferguson